

COMMONWEALTH EDISON COMPANY :
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Approval of Energy Efficiency and Demand : **Docket No. 07-0540**
Response Plan Pursuant to Section 12-103(f) :
Of the Public Utilities Act :

ON BEHALF OF

DECEMBER 14, 2007

1 I. Introduction and Qualifications

2 Q. Please state your name and business address.

3 A. My name is Allan Skodowski. My work address is 111 E. Kilbourn Ave.
4 Milwaukee, WI 53202.

5 Q. By whom are you employed and in what capacity?

6 A. I am Senior Vice President and Director of Engineering in the Midwest for
7 Transwestern. Transwestern has a reputation as one of the strongest resources
8 nationwide for asset owners seeking property management that adds value to the
9 bottom line. Transwestern has, on average, reduced building energy consumption
10 in its managed portfolio by 20 to 30%. As a result, Transwestern has been
11 recognized by the EPA as an ENERGY STAR® Partner of the Year (2004, 2005)
12 and as a Sustained Excellence Partner (2006, 2007).
13 Transwestern is an active member of the United States Green Building Council
14 (USGBC) with over 13 million sq. ft. registered under the LEED for Existing
15 Buildings Rating System. The LEED program is an industry-recognized benchmark
16 for ongoing operations of buildings to optimize efficiencies while minimizing
17 environmental impact. Transwestern is among a very limited number of market
18 leaders participating in the USGBC Portfolio Program. Continuous enhancement is
19 part of our strategic approach.

20 Q. On whose behalf are you testifying in this proceeding?

21 A. I am testifying on behalf of The Building Owners and Managers Association of
22 Chicago (“BOMA/Chicago”). Transwestern buildings are members of
23 BOMA/Chicago; I serve on the BOMA/Chicago Energy Committee, and have
24 participated in the stakeholder process that led to this proceeding.

25 Q. Would you please summarize your professional qualifications?

26 A. I have 25 years experience in the energy industry with various companies holding
27 various positions. My short biography is attached as Exhibit 3.1.

28

29 Purpose and Recommendations

30 Q. What is the purpose of your testimony?

31 A. The purpose of my testimony is:

- 32 • To describe current BOMA/Chicago energy policies/strategies and initiatives that
33 provide important context for the design and administration of the proposed
34 ComEd programs;
- 35 • To show BOMA/Chicago support for the legislative, Illinois Commerce
36 Commission (“Commission”), and ComEd energy efficiency initiatives that are
37 the subject of this proceeding;
- 38 • To proclaim the energy efficiency expertise and track record of BOMA/Chicago
39 members, and the importance of including BOMA/Chicago as a full and ongoing
40 partner in the design of the proposed ComEd programs, and finally;
- 41 • To make specific recommendations to the Commission regarding the conduct and
42 the priorities for this important ComEd program.

43 Q. What are the current BOMA/Chicago energy policies/strategies and initiatives
44 that provide important context for the design and administration of the proposed
45 ComEd programs?

46 A. BOMA/Chicago has been an active participant in the energy industry for many
47 years.

BOMA/Chicago has long advocated a robust competitive electricity market, and virtually all of BOMA/Chicago building members have been declared competitive. BOMA/Chicago's energy initiatives fall into three buckets:

- BOMA/Chicago has been singularly active over the last several years in promoting a competitive electric supply market for Northern Illinois. As a recent example, BOMA/Chicago is developing a standardized supply contract for use by its Members. The goals are to simplify the competitive bid process for both suppliers and consumers and to foster competition among suppliers.

- BOMA/Chicago has been a demonstrated leader in the energy efficiency marketplace. As an example, BOMA/International has entered into an education partnership with EPA's ENERGY STAR® to provide building owners and managers with current and developing information regarding energy efficiency.

- Participation by BOMA/Chicago members in regional demand response programs can provide significant economic benefits both directly to member participants and indirectly to all Chicago electric consumers. Member buildings have traditionally been active in past ComEd curtailment programs, and many are beginning to utilize the PJM Load Response Program to implement price response. The first customers in ComEd's service territory to participate in PJM's demand response programs were BOMA/Chicago buildings.

Q. Does BOMA/Chicago support the programs proposed by ComEd?

A. BOMA/Chicago applauds the Illinois legislature, the Commission, and ComEd for the energy efficiency initiatives that are the subject of this proceeding. Energy efficiency is important to our Members and to their tenants. Member's energy

71 efficiency initiatives also provide significant indirect economic benefit to all of
72 Chicago's electric consumers.

73 Q. Please describe the energy efficiency expertise and track record of
74 BOMA/Chicago members.

75 A. BOMA/Chicago Members' energy efficiency expertise underscores the
76 importance of including BOMA/Chicago as a full and ongoing partner in the
77 design of the proposed ComEd programs. I speak from the perspective of a
78 building engineer that is very active both locally and nationally in energy
79 efficiency programs for buildings. There are two energy efficiency programs that
80 BOMA/Chicago members actively participate in:

81 • BOMA/International sponsors the BOMA Energy Efficiency Program
82 ("BEEP"), a six-course series that provides information, strategies, technologies,
83 how-to guides and resources to reduce energy and costs. The BEEP program has
84 been developed by the BOMA Foundation in partnership with the U.S.
85 Environmental Protection Agency ENERGY STAR® program and is supported
86 in part by a grant from EPA. For large buildings, including hospitals,
87 governmental buildings and commercial buildings, the ENERGY STAR®
88 program is a free program already existing in the marketplace that standardizes
89 energy efficiency with consistent and solid information for comparison internally
90 or with peers. In order to participate in this program, the single most important
91 need for buildings is access to information which will provide a more discerning
92 capital profile, benchmark buildings and track performance.

93 • Second is the Leadership in Energy and Environmental Design (LEED)
94 Green Building Rating System™ which encourages and accelerates global
95 adoption of sustainable green building and development practices through the
96 creation and implementation of universally understood and accepted tools and
97 performance criteria.

98 Q. Do you have specific recommendations you would like to make to the
99 Commission regarding the program proposed by ComEd?

100 A. Yes. I have two recommendations regarding the conduct and the priority for this
101 important ComEd program. First, the Commission and ComEd should establish a
102 formal partnership between ComEd and BOMA/Chicago for the design of energy
103 efficiency programs applicable to commercial buildings in Chicago. The goal is
104 robust ComEd support and advancement of BOMA/Chicago energy efficiency
105 initiatives. – and robust ComEd administration of the resulting programs. We
106 want institutional programs that advance building owners’ energy efficiency goals
107 and spur robust participation by BOMA/Chicago members – because the
108 programs are on target, complement current member initiatives, and are easy to
109 use.

110 BOMA/Chicago and its Members have demonstrated the desire and the know-
111 how to best achieve energy efficiency in our buildings. The best outcome
112 requires that the Commission and ComEd regard BOM/Chicago as a partner in
113 ongoing program design decisions, not merely as someone from whom to solicit
114 “input”.

115 Q. What is your second recommendation?

116 A. As the initial step, in order to support several agendas, including energy efficiency
117 improvement and data infrastructure that supports ComEd and BOMA/Chicago, a
118 program should be put in place to allow all buildings, not just ComEd program
119 participants, the ability to access building data at no charge. By mandating
120 customer access to their own data supports several agendas, including energy
121 efficiency improvement (both capital and operating), competitive supply pricing
122 and evaluation, and demand response program participation. I will speak to
123 energy efficiency; Mr. Vincent Cushing will speak to demand response.

124 Q. Please briefly describe the ENERGY STAR® program.

125 A. For large buildings, including hospitals, governmental buildings and commercial
126 buildings, there is a large body of knowledge already existing in the marketplace
127 that standardizes energy efficiency. This program is the ENERGY STAR®
128 Program, which is a free program, with consistent and solid information for
129 comparison internally or with peers. The single most important need for
130 buildings is access to information which will provide a more discerning capital
131 profile, benchmark buildings and track performance.

132 Q. What are the impediments for participating in Energy Star Programs?

133 A. In order to participate in the Energy Star program, total building consumption
134 data is needed for benchmarking and load profiling of buildings. Today, I can
135 access my building usage data on a half hour interval by ordering the data from
136 ComEd at \$22.00 per interval meter. Typically, building mechanical equipment is
137 separately metered by ComEd and many buildings have several interval meters,
138 usually along with cumulative meters with no time of use feature. The data

139 acquired provides only historical data for two years of time; however, if I want
140 that data again a month or quarter from now, the cost to acquire the data is the
141 same. Furthermore, to participate in ENERGY STAR®, consumption data is
142 required for the whole building, tenants included, in order to benchmark and
143 evaluate options.

144 Q. ComEd provides in Section 3.4.2. Business Solutions a complementary set of
145 energy management options, including encouraging customers to use the building
146 benchmarking services available as a first step toward the adoption of a whole
147 building perspective on energy management. ComEd also states it will provide
148 building energy consumption data needed for benchmarking to building owners
149 and, based on the level of customer interest, may move toward automated data
150 transfer for benchmarking. (See page 8 of ComEd Ex. 1.0). ComEd states that
151 they will provide Program participants. (See page 8 of Petition).

152 A. This is encouraging, but simply doesn't go far enough. Clearly, to support energy
153 efficiency and to make any sort of reasonable calculation of investment,
154 customers, and their contractors, administrators of this program, etc. require data
155 to evaluate any improvement or efficiency investment. Today, ComEd charges
156 \$600 for monthly data; if I wanted to benchmark one building for one year, I
157 would currently have to pay \$7,200. Therefore, as part of this case, the ICC
158 should require ComEd to provide this information in an electronic format
159 compatible with EPA's programs for free, or at their marginal cost. With this
160 data, the building engineers can visualize building performance, provide a solid
161 comparison with like buildings, track performance and consumption, and verify

162 and measure any improvements from certain points in time. Quite simply,
163 acquiring this data is the single biggest hurdle from participation in such
164 programs.

165 Q. Does this conclude your testimony?

166 A. Yes.